

Our Ref:



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 13645

Date: Wednesday August 28, 2019
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Final Comment

In terms of Section 38(4), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Renaissance Resources (PTY) Ltd

Unit G3, Victoria Junction
57 Prestwich Street Green Point,
Cape Town,
8001
South Africa

PO Box 51288
Waterfront
8002

APPLICATION FOR A PROSPECTING RIGHT ON A PORTION OF PORTION 1 OF THE FARM BIESJESFONTEIN 218 SITUATED IN THE MAGISTERIAL DISTRICT OF BARKLEY WEST RD, NORTHERN CAPE PROVINCE. REFERENCE NC 30/5/1/1/2/12324 PR.

Lindie Wiehahn Consultants have been appointed by Renaissance Resources (Pty) Ltd to conduct an Environmental Authorisation (EA) Application and Prospecting Right (PR) Application for proposed prospecting activities on a portion of portion 1 of the farm Biesjesfontein 218 situated in the Magisterial District of Barkley West, Northern Cape Province (NC 30/5/1/1/2/12324 PR).

A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, no 107 of 1998 (NEMA), NEMA Environmental Impact Assessment (EIA) Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 28 of 2002 (MPRDA)(As amended). The proposed prospecting activities will include 4 boreholes with an impact area of 40m² each covering an application area of 15, 8843 ha.

The dBAR notes that a Heritage Impact Assessment (HIA) has been requested to be completed and will be submitted when received.

In an Interim Comment issued on 18/04/2019, SAHRA noted the pending HIA and additionally noted that a Paleontological Impact Assessment must be undertaken. Since the issuing of the Interim Comment, a Heritage



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Scoping Study has been submitted.

Kruger, N. 2019. Heritage Scoping Study (HS) of demarcated areas on a portion of portion 1 of the farm Biesjesfontein 218 for the proposed Biesjesfontein 218 Prospecting Project in the Frances Baard District Municipality, Northern Cape Province.

The desktop only report indicates that heritage resources such as Stone Age artefacts may be present along drainage lines and ridges and Late Iron Age settlements may occur on slopes around single hills and rock outcrops. The former “At Last” farmstead might prove sensitive for historical structures and graves.

Recommendations provided in the report include the following:

- The project area falls within a paleontologically sensitive zone and a Palaeontological Desktop Assessment (PDA) was commissioned for the proposed project. Cognisance should be taken of further recommendations included in the PDA Report;
- The term “Living Heritage” can broadly refer to a place of cultural heritage and sacred nature; with cultural attributions that are not generally physically manifested. Ritual and symbolic spaces and practices, and the material residues thereof convey an intangible cultural significance beyond the physical site or artefact, where the meaning of the ritual area speaks directly of a sense of place and lived experience. Such sites might occur on the Biesjesfontein property or its surroundings and due cognisance should be taken of these sites of “Living Heritage” in the cultural landscape;
- It is recommended that all graves and cemeteries that might occur in the project area be conserved and excluded from impact emanating from the development. Where impact on such resources would prove to be inevitable, the correct human remains repatriation procedures should be observed at all times. These procedures should include public notification of intent to relocate the remains, consultation with descendant communities, close liaison with -and approval from local futurities, adherence to any local laws and / bylaws, and correct grave relocation methodologies;
- It is possible that groups, farmers and locals living in the area have occupied the region for many generations and have expressed long-term cultural associations with the region. Therefore, it is important to ascertain from these respondents whether there are any further undetected sites of cultural significance in the area to which they relate and / or attach cultural meaning;
- Ultimately, it is recommended that the archaeological and cultural heritage of this part of the Northern Cape Province be respected. The management of heritage resources, as stipulated by National and International Heritage resources agencies (e.g. SAHRA) should be aligned with any future activity by



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means of cultural mitigation and/or management plans developed in conjunction with heritage authorities and specialists; and

- It should be noted that this HS and site sensitivity included above are solely based on off-site desktop findings and the heritage sensitivity of the Biesjesfontein property remains tentative pending further detailed site inspection as part of the Heritage Impact Assessment (HIA) process, subject to section 38 of the NHRA.

In an Interim Comment issued on the 10/05/2019, SAHRA requested that the outstanding Palaeontological Assessment be submitted for review before further comments could be issued.

Fourie, H. 2019. Palaeontological Impact Assessment: Desktop Study Biesjesfontein 218 Prospecting Project.

The proposed development area is underlain by Quaternary aeolian sands which are known to contain fossils such as mammalian bones and teeth, tortoise remains, ostrich eggshells, non-marine molluscs, trace fossils, freshwater stromatolites and plant material. Recommendations provided in the report include that a field survey to be conducted.

Final Comment

The following comments are made as a requirement in terms of section 3(4) of the NEMA Regulations and section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- 38(4)a – The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit has no objections to the proposed prospecting on the condition that each of the four planned boreholes is assessed prior to construction by a qualified archaeologist and palaeontologist. The results of the assessment must be submitted in a report format to SAHRA for comment. No construction may occur without comment from SAHRA in this regard. SAHRA reserves the right to provide additional conditions and mitigation measures for the proposed development should heritage resources be impacted;
- 38(4)b – The recommendations provided by the heritage specialists are supported and must be adhered to;
- 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted as per

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section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;

- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- 38(4)d – See section 51(1) of the NHRA;
- 38(4)e – The following conditions apply with regards to the appointment of specialists:
 - i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;
 - The Final BAR and EMPr must be submitted to SAHRA for record purposes;
 - The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

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Phillip Hine
Acting Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/522292>
(DMR - NC, Ref: NC 30//1/1/2/12324 PR)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.